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AO 91 (Rev. 08/09) Criminal Complaint

Special Agent: Thomas Sondgeroth

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UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America,

Plaintiff,

v.

Amor M. Ftouhi

**Case: 4:17-mj-30312****Judge: Davis, Stephanie Dawkins****Filed: 06-21-2017****CMP USA v AMOR M. FTOUHI (TH)**

Defendant(s).

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**CRIMINAL COMPLAINT**

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I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of June 21, 2017, in the county of Genesee  
in the Eastern District of Michigan, the defendant(s) violated:

*Code Section*

Title 18 U.S.C. § 37(a)(1)

*Offense Description*

Violence at international airport

This criminal complaint is based on these facts:

On June 21, 2017, in the Eastern District of Michigan, Amor M. Ftouhi, unlawfully and intentionally used a weapon, specifically a knife, to perform an act of violence against another individual at Bishop International Airport, an airport serving international civil aviation, that endangered and was likely to endanger safety at that airport, and that caused and was likely to cause death or serious bodily injury, including substantial risk of death or serious bodily injury, including substantial risk of death and extreme physical pain, all in violation of 18 U.S.C. § 37(a)(1).



Continued on the attached sheet.

  
*Complainant's signature*Thomas Sondgeroth, SA, FBI*Printed name and title*

Sworn to before me and signed in my presence.

Date: June 21, 2017  
*Judge's signature*City and state: Flint, MichiganStephanie Dawkins Davis, U.S. Magistrate Judge  
*Printed name and title*

**Affidavit in Support of a Criminal Complaint**

I, Thomas M. Sondgeroth, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), currently assigned to the FBI's Detroit Division, Flint Resident Agency. I have been employed with the FBI since May 2006. Before joining the FBI, I was employed as a police officer in the State of Illinois for nine years. As an FBI agent and police officer, I have participated in investigations involving various violent crimes and other federal offenses.
2. I make this affidavit in support of a Criminal Complaint. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, law enforcement officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the complaint and does not set forth all of my knowledge about this matter.
3. Based on the facts set forth in this affidavit, there is probable cause to believe that a violation of 18 U.S.C. § 37(a)(1) has been committed by Amor M. Ftouhi.

**Probable Cause**

4. On Wednesday, June 21, 2017, I went to the Bishop International Airport, in Flint, Michigan, in the Eastern District of Michigan, in the United States of America, after hearing a report of a stabbing involving an airport security officer.
5. While at the airport, I spoke with another law enforcement officer who observed the attack. The officer informed me that on the morning of June 21, 2017, an individual who was later identified as Amor M. Ftouhi used a large knife to stab a police officer at the airport. Specifically, the officer told me that Ftouhi walked up to a fully-uniformed police officer at a publicly accessible area of the airport, yelled "Allahu Akbar," pulled out a knife and stabbed the officer in the neck. After stabbing the police officer, Ftouhi continued to yell "Allah" several times. He further exclaimed something similar to, "you have killed people in Syria, Iraq, and Afghanistan, and we are all going to die." The law enforcement officer was able to subdue Ftouhi, who asked the officer why he did not kill him. The officer also took all of Ftouhi's possessions, which included identification documents for Amor M. Ftouhi.
6. I have also spoken with another FBI agent who reviewed surveillance video of the airport premises, including the location of the stabbing. The agent

informed me that at approximately 8:52 a.m., Ftouhi entered the first level of Bishop International Airport carrying a red duffle and a dark satchel bag. At approximately 9:10, Ftouhi went up an escalator to the second level of the airport. At the top of the escalator, Ftouhi turned left to go to a restaurant. At approximately 9:37:56, Ftouhi left the restaurant carrying both bags. Ftouhi entered a second-floor restroom at 9:38:15 and left at approximately 9:38:43 without either bag. At 9:38:48, Ftouhi attacked the officer and was subdued by other law enforcement shortly after.

7. Based on my experience and training, I am aware that when an individual stabs another in the neck with a knife, that act is likely to cause death or serious bodily injury as defined by 18 U.S.C. § 1365(h)(3) (such as a substantial risk of death or extreme physical pain). Indeed, in this case, the victim of the stabbing was immediately transported to a local hospital where he underwent surgery.
8. Based on my communications with the law enforcement officer who subdued Ftouhi, I am aware that the knife used to commit the stabbing was a large knife. I have also spoken to another FBI agent who examined the knife and informed me that it had a green handle and a black serrated blade and was marked Amazon Jungle Survival Knife. Based on my experience and

training, I am aware that such a knife, particularly when used to stab another, is a dangerous weapon.

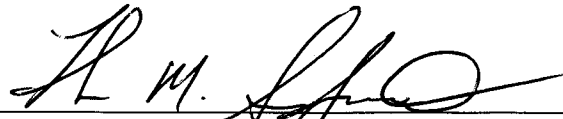
9. Because the stabbing occurred at Bishop International Airport, and involved a law enforcement officer employed by the airport, I am further aware that the act was likely to endanger safety at that airport. I am further aware that the airport was closed for several hours following the attack.
10. Based on my training and experience, and based on my conversations with employees of Bishop International Airport, I am aware that Bishop International Airport serves international civil aviation.

#### **Conclusion**

11. Based on the foregoing, I have probable cause to believe that on June 21, 2017, in the Eastern District of Michigan, Amor M. Ftouhi, unlawfully and intentionally used a weapon, specifically a knife, to perform an act of violence against another individual at Bishop International Airport, an airport serving international civil aviation, that endangered and was likely to

endanger safety at that airport, and that caused and was likely to cause death or serious bodily injury, including substantial risk of death and extreme physical pain, all in violation of 18 U.S.C. § 37(a)(1).

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'T. M. Sondgeth', written over a horizontal line.

Thomas M. Sondgeth  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me on June 21, 2017.

A handwritten signature in black ink, appearing to read 'Stephanie Dawkins Davis', written over a horizontal line.

HON. STEPHANIE DAWKINS DAVIS  
United States Magistrate Judge